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October 24, 1990

Reference No. 2980

Mr. Brad Bradley  
Remedial Project Manager  
U. S. Environmental Protection Agency  
230 South Dearborn Street  
Chicago, Illinois 60604

Dear Mr. Bradley:

Re: Proposed Modifications for the Second Work Plan Supplement  
Manville Remediation Area - Waukegan, Illinois

As discussed with you during our Site meetings of August 29, 1990 and October 3, 1990, the following revisions to the Second Work Plan Supplement work activities are proposed for the Manville project:

- i) Reinstatement of the easternmost perimeter road through construction of a 20-foot wide Class I gravel road in lieu of the originally approved 24-inch thick vegetative soil cover over the former road;
- ii) Deletion of the 20-foot wide Class I gravel road north of the Pumping Lagoon and placement of a 24-inch thick vegetative soil cover in its place; and
- iii) Backfill and grading of the existing easternmost Seepage Basin with sand from the approved borrow pit to provide positive drainage of surface runoff from the reinstated East Road prior to placement of the approved 24-inch thick vegetative soil cover in the area.
- iv) Provision of a 16-foot wide Class II gravel roadway over the existing boundary perimeter road around the Borrow Pit area north of the Pumping Lagoon and west end of the Industrial Canal. In addition to the roadway, a 24-inch thick vegetated cover would be provided adjacent to the roadway in selected areas, mainly on the east and north legs of the boundary road. We propose that the exact limits of the vegetated soil cover be determined jointly in the field by the USEPA and Manville Site representatives.

As discussed with you, Items i) and ii) above did not require formal USEPA approval since the proposed change did not affect the integrity of the remedial soil cover design. Items iii) and iv) were verbally agreed to by you during our August 29, 1990 meeting. The originally proposed 24-inch thick vegetative soil cover through the Seepage Basin could potentially have retained surface runoff

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which would cause erosion and flooding conditions at the southernmost end of the Seepage Basin. Backfilling and grading of the Seepage Basin with sand will provide positive drainage of surface runoff to the east and eliminate the above problems. The provision of a Class II roadway on the perimeter Borrow Pit area roadway will remediate ACM materials existing there in a similar fashion to the rest of the remediation area.

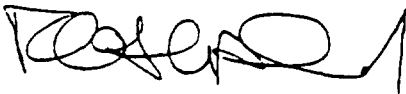
The completion date specified for the Second Work Plan Supplement scope of work is 150 calendar days from the USEPA approval date of August 3, 1990, or December 31, 1990. Our estimate of additional time required to complete the additional work described above is 75 calendar days, or to March 16, 1991. As you can appreciate, we have concerns with our ability to complete any field work during the winter months of January, February and the majority of March due to climatic conditions that may then exist. Because of these concerns, we propose that the completion date for the revised Second Work Plan Supplement scope of work be modified to May 31, 1991.

We have enclosed revised Plans 1, 2 and 3 reflecting the proposed changes discussed above for USEPA formal written approval.

Should you have any questions, please contact us at your convenience.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES



Richard G. Shepherd, P. Eng.

RGS/amr/38

Enclosures

cc: B. Ray  
D. Wheeler  
S. Jung